

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

----- In re:  CarePoint Health Systems Inc. d/b/a Just Health Foundation, et al., <sup>1</sup>  <div style="text-align: center;">Debtors.</div> -----	x : : : : : : : v	Chapter 11 Case No. 24-12534 (JKS)  (Jointly Administered)
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**AMENDED<sup>2</sup> NOTICE OF AGENDA REGARDING MATTERS SCHEDULED FOR  
HEARING ON  
JANUARY 7, 2025 AT 9:30 A.M. (ET)<sup>3</sup>**

This proceeding will be conducted **in-person**.  
All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom.  
Please refer to Judge Stickles' Chambers Procedures  
(<https://www.deb.uscourts.gov/content/judge-j-kate-stickles>) and the Court's website  
(<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate  
remotely, the method of allowed participation (video or audio), Judge Stickles' expectations of  
remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the  
hearing unless otherwise noticed using the [eCourtAppearances](#) tool available on the Court's  
website.

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

<sup>2</sup> All amendments are highlighted in **Bold**.

<sup>3</sup> All motions and other pleadings referenced herein are available online at the following web address:  
<https://dm.epiq11.com/CarePoint>

**I. MATTERS UNDER CNO**

1. Motion of the Debtors for Order Pursuant to Sections 105(a), 363, and 364 of the Bankruptcy Code for Authority to Enter Into an Insurance Premium Finance Agreement in the Ordinary Course of Business [Filed: 12/12/2024; D.I. [286](#)].

Related Documents:

- A. Certificate of No Objection Regarding Motion of the Debtors for Entry Pursuant to Sections 105(a), 363, and 364 of the Bankruptcy Code for Authority to Enter Into an Insurance Premium Finance Agreement in the Ordinary Course of Business [Filed 12/30/2024; D.I. [379](#)].

Objection Deadline: December 26, 2024 at 4:00 p.m. (ET).

Objections Received: None.

Status: A CNO has been filed. No hearing is necessary unless required by the Court.

2. Application for Order, Pursuant to 11 U.S.C. §§ 328, and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Co-Counsel to the Official Committee of Unsecured Creditors of CarePoint Health Systems, Inc. d/b/a Just Health Foundation, *et al. Nunc Pro Tunc* to November 20, 2024 [Filed: 12/17/2024; D.I. [317](#)].

Related Documents:

- A. Certification of No Objection Regarding Application for Order, Pursuant to 11 U.S.C. §§ 328, and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Co-Counsel to the Official Committee of Unsecured Creditors of CarePoint Health Systems, Inc. d/b/a Just Health Foundation, *et al. Nunc Pro Tunc* to November 20, 2024 [Filed: 01/02/2025; D.I. [383](#)].
- B. **Order Authorizing and Approving the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Co-Counsel to the Official Committee of Unsecured Creditors of CarePoint Health Systems, Inc. d/b/a Just Health Foundation, *et al. Nunc Pro Tunc* to November 20, 2024 [Filed: 01/03/2025; D.I. 391].**

Objection Deadline: December 31, 2024 at 4:00 p.m. (ET)

Objections Received: None

Status: **An Order has been entered. This matter will not go forward.**

3. Application to Retain and Employ Sills Cummis & Gross P.C. as Attorneys for the Official Committee of Unsecured Creditors of CarePoint Health Systems Inc. d/b/a Just Health Foundation, *et al.*, to November 20, 2024 [Filed: 12/17/2024; D.I. [318](#)].

Related Documents:

- A. Certification of No Objection Regarding Application to Retain and Employ Sills Cummis & Gross P.C. as Attorneys for the Official Committee of Unsecured Creditors of CarePoint Health Systems Inc. d/b/a Just Health Foundation, *et al.*, to November 20, 2024 [Filed: 01/02/2025; D.I. [384](#)].
- B. **Order Authorizing the Employment and Retention of Sills Cummis & Gross P.C. as Attorneys for the Official Committee of Unsecured Creditors of CarePoint Health Systems Inc. d/b/a Just Health Foundation, *et al.*, to November 20, 2024 [Filed: 01/03/2025; D.I. 392].**

Objection Deadline: December 31, 2024 at 4:00 p.m. (ET)

Objections Received: None

Status: **An Order has been entered. This matter will not go forward.**

## II. MATTERS GOING FORWARD

4. Motion of CarePoint Health Systems, Inc. for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (V) Authorizing Debtors to Use Cash Collateral [Filed 11/03/2024; D.I. [10](#)].

Related Documents:

- A. Certification of Counsel Regarding Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024; D.I. [86](#)].

- B. Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024; D.I. [87](#)].
- C. Certification of Counsel Regarding Interim Order (I) Authorizing Certain Debtors to Obtain Postpetition Financing from Bayonne Medical Center Opco, LLC and Granting Senior Security Interests and Superpriority Administrative Expense Status to the Lender; (II) Authorizing the Debtors' Use of Cash Collateral; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Filed: 11/08/2024; D.I. [118](#)].
- D. Interim Order (I) Authorizing Certain Debtors to Obtain Postpetition Financing from Bayonne Medical Center Opco, LLC and Granting Senior Security Interests and Superpriority Administrative Expense Status to the Lender; (II) Authorizing the Debtors' Use of Cash Collateral; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Filed: 11/08/2024; D.I. [119](#)].
- E. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)].
- F. Proposed Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/09/2024; D.I. [265](#)].
- G. Certification of Counsel Regarding Order Authorizing Debtor-In-Possession Financing on an Interim Basis [Filed: 12/10/2024; D.I. [274](#)].
- H. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/10/2024; D.I. [275](#)].
- I. Certification of Counsel Regarding Order Authorizing Debtor-In-Possession Financing on an Interim Basis [Filed: 12/26/2024; D.I. [365](#)].
- J. Order Approving Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/26/2024; D.I. [367](#)].
- K. Proposed Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 01/03/2025; D.I. [386](#)].

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The Objection Deadline was further extended to December 20, 2024 at 4:00 p.m. (ET)[D.I. [272](#)].

Responses:

- L. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024; D.I. [71](#)].

- M. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)].
- N. Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral [Filed: 11/13/2024; D.I. [133](#)].
- O. The County of Hudson's Limited Objection to Debtors' Motions for Interim and Final Orders to Obtain Post-Petition Financing [Filed: 12/09/2024; D.I. [261](#)].
- P. Limited Objection of Med One Capital Funding LLC and Mazuma Capital Corp to Debtors' Motions for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 12/09/2024; D.I. [262](#)].

Status: This matter is going forward for the limited purpose of entry of an interim order authorizing further interim financing through the hearing on February 12, 2025 at 10:00 a.m.

- 5. Motion of IJKG Opco, LLC and IJKG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed 11/03/2024, D.I. [11](#)].

Related Documents:

- A. Amendment to Motion of IJKG Opco, LLC and IJKG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 11/06/2024, D.I. [68](#)].
- B. Certification of Counsel Regarding Interim Order Authorizing Debtors to Postpetition Financing [Filed 11/07/2024, D.I. [86](#)]. (See 4A)

- C. Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024, D.I. [87](#)]. (See 4B)
- D. Certification of Counsel Regarding Interim Order (A) Authorizing IJGG Opco, LLC and IJGG, LLC to Obtain Postpetition Financing, (B) Authorizing Debtors to Use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Modifying the Automatic Stay, (E) Authorizing Debtors to Enter Into Agreements with Bayonne Medical Center Opco, LLC, (F) Granting Adequate Protection, (G) Scheduling a Final Hearing and (H) Granting Related Relief [Filed: 11/08/2024; D.I. [127](#)].
- E. Interim Order (A) Authorizing IJGG Opco, LLC and IJGG, LLC to Obtain Postpetition Financing, (B) Authorizing Debtors to Use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Modifying the Automatic Stay, (E) Authorizing Debtors to Enter Into Agreements with Bayonne Medical Center Opco, LLC, (F) Granting Adequate Protection, (G) Scheduling a Final Hearing and (H) Granting Related Relief [Filed: 11/08/2024; D.I. [128](#)].
- F. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)]. (See 4E)
- G. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/09/2024; D.I. [265](#)]. (See 4F)
- H. Certification of Counsel Regarding Order Authorizing Debtor-In-Possession Financing on an Interim Basis [Filed: 12/10/2024; D.I. [274](#)]. (See 4G)
- I. Certification of Counsel Regarding Order Authorizing Debtor-In-Possession Financing on an Interim Basis [Filed: 12/26/2024; D.I. [365](#)]. (See 4I)
- J. Order Approving Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/26/2024; D.I. [367](#)]. (See 4J)
- K. Proposed Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 01/03/2025; D.I. [386](#)]. (See 4K)

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The Objection Deadline was further extended to December 20, 2024 at 4:00 p.m. (ET)[D.I. [272](#)].

Responses:

- L. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)]. (See 4L)

- M. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)].
- N. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)]. (See [4M](#))
- O. Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral [Filed: 11/13/2024; D.I. [133](#)]. (See [4N](#))
- P. The County of Hudson's Limited Objection to Debtors' Motions for Interim and Final Orders to Obtain Post-Petition Financing [Filed: 12/09/2024; D.I. [261](#)]. (See [4O](#))
- Q. Limited Objection of Med One Capital Funding LLC and Mazuma Capital Corp to Debtors' Motions for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 12/09/2024; D.I. [262](#)]. (See [4P](#))

Status: This matter is going forward for the limited purpose of entry of an interim order authorizing further interim financing through the hearing on February 12, 2025 at 10:00 a.m.

- 6. Motion of Access Information Management Corporation (I) to Compel (A) Debtors' Assumption of Executory Contracts, or Alternatively, (B) Debtors to Provide Direction as Required by the Contracts and Applicable Law with Respect to the Continued Storage, Transfer, Destruction or Other Disposition of the Health Care Related Documents and Information Subject to the contracts, (II) For Relief from the Automatic Stay, and (III) for Such Other Relief as is Necessary Under the Circumstances [Filed: 12/17/2024; D.I. [320](#)].

Related Documents: None.

Objection Deadline: December 31, 2024 at 4:00 p.m. (ET)

Objections Received:

- A. Debtors' Objection To Access Management Information Management Corporation's Motion (I) to Compel (a) Debtors' Assumption of Executory Contracts, or Alternatively, (b) Debtors to Provide Direction as Required by



the Contracts and Applicable Law With Respect to the Continued Storage, Transfer, Destruction or Other Disposition of the Health Care Related Documents and Information Subject to the Contracts, (II) For Relief From the Automatic Stay, and (III) for Such Other Relief as is Necessary Under the Circumstances [Filed: 12/31/2024; D.I. [381](#)].

Status: **This matter has been continued to February 12, 2025 at 10:00 am.**

### **III. MATTERS NOT GOING FORWARD**

7. Motion of the Debtors for the Entry of an Order (I) Authorizing the Debtors to Retain, Employ and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 11/19/2024; D.I. [160](#)].

Related Documents:

- A. Amended Schedule I – Non-Exclusive List of Ordinary Course Professionals [Filed: 12/05/2024; D.I. [225](#)].
- B. Revised Form of Declaration [Filed: 12/05/2024; D.I. [239](#)]
- C. Certification of Counsel Regarding Order Authorizing (I) The Debtors to Retain, Employ and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 12/09/2024; D.I. [263](#)].
- D. Certification of Counsel Regarding Order Authorizing (I) The debtors to Retain, Employ and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 12/17/2024; D.I. 319].
- E. Order Authorizing the Debtors to Retain, Employ and Compensate Professionals Utilized in the Ordinary Course of Business and Granting Related Relief [Filed: 12/18/2024; D.I. [325](#)].

Objection Deadline: December 3, 2024 at 4:00 p.m. (ET). The objection deadline has been extended to December 5, 2024 at 4:00 p.m. for the U.S. Trustee and Official Creditors Committee only.

Objections Received:

- F. Objection of U.S. Trustee to Debtor's Motion for Entry of an Order (I) Authorizing the Debtors to Retain, Employ and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 12/04/2024; D.I. [220](#)].

Status: An Order has been entered. This matter will not go forward.



#### IV. MATTERS BEING CONTINUED

8. Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow *Inter Alia*, Interim Hospital Operations, (B) A Final Order Approving A Private Sale of All Or Substantially All Assets of IJKG Opco, LLC and IJKG, LLC and (C) Granting Related Relief [Filed: 11/04/2024, D.I. [18](#)].

##### Related Documents:

- A. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)].
- B. Certification of Counsel Regarding Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/09/2024; D.I. [266](#)]
- C. Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/10/2024; D.I. [272](#)]

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The supplemental objection deadline is December 11, 2024 at 4:00 p.m. (ET). The Objection Deadline was further extended to December 20, 2024 at 4:00 p.m. (ET)[D.I. [272](#)].

##### Responses:

- D. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)].
- E. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)].
- F. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)].
- G. Limited Objection of Sodexo Operations, LLC to: (1) Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow *Inter Alia*, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJKG opco, LLC and IJKG, LLC and (C) Granting Related Relief; (2) Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief; and (3) Motion of the Debtors for an Order (I)

Authorizing the Entry Into the Hospital Facilities Management Services Agreement, and (II) Granting Related Relief [Filed: 12/19/2024; D.I. [331](#)].

- H. Reservation of Rights and, to the Extent Necessary, Limited Objection to Debtor's Motion for Entry of Orders (A) Approving Collateral Surrender Agreement and (B) Authorizing the Assumption of the Management Services Agreement and the Form and Manner of Notice Thereof [Filed: 12/20/2024; D.I. [332](#)].
- I. Reservation of Committee of Interns and Residents to Debtors' Motion for a Private Sale of Bayonne Medical Center [Filed: 12/20/2024; D.I. [333](#)].
- J. First Financial Holdings, LLC dba First Financial Equipment Leasing's Opposition to Debtors IJG Opco, LLC and IKJG, LLC's Motion for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJG opco, LLC and IJG, LLC and (C) Granting Related Relief [Filed: 12/20/2024; D.I. [334](#)].
- K. Affidavit in Support of Opposition of First Financial Holdings, LLC dba First Financial Equipment Leasing re D.I. 334 [Filed: 12/20/2024; D.I. [335](#)].
- L. Joinder of SCG Capital Corporation to First Financial Holdings, LLC dba First Financial Equipment Leasing's Opposition to Debtors IJG Opco, LLC and IKJG, LLC's Motion for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJG opco, LLC and IJG, LLC and (C) Granting Related Relief [Filed: 12/20/2024; D.I. [337](#)].
- M. Limited Objection and Reservation of Rights of Cerecore [Filed: 12/20/2024; D.I. [338](#)].

Status: The Debtors are not seeking approval of the Motion at this time. The Debtors will seek limited relief related to the Motion pursuant to D.I. 377 at a hearing scheduled for January 13, 2025 at 10:00 a.m.

- 9. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief [Filed: 11/04/2024, D.I. [19](#)].

Related Documents:

- A. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)].

- B. Certification of Counsel Regarding Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/09/2024; D.I. [266](#)]
- C. Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/10/2024; D.I. [272](#)]

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The supplemental objection deadline is December 11, 2024 at 4:00 p.m. (ET). The Objection Deadline was further extended to December 20, 2024 at 4:00 p.m. (ET)[D.I. [272](#)].

Responses:

- D. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)].
- E. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)].
- F. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)].
- G. Limited Objection of Sodexo Operations, LLC to: (1) Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJKG opco, LLC and IJKG, LLC and (C) Granting Related Relief; (2) Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief; and (3) Motion of the Debtors for an Order (I) Authorizing the Entry Into the Hospital Facilities Management Services Agreement, and (II) Granting Related Relief [Filed: 12/19/2024; D.I. [331](#)].
- H. Limited Objection and Reservation of Rights of Cerecore [Filed: 12/20/2024; D.I. [338](#)].

Status: The Debtors are not seeking approval of the Motion at this time. The Debtors will seek limited relief related to the Motion pursuant to D.I. 377 at a hearing scheduled for January 13, 2025 at 10:00 a.m.

- 10.** Motion of the Debtors for an Order (I) Authorizing the Entry Into the Hospital Facilities Management Services Agreement, and (II) Granting Related Relief [Filed: 12/01/2024; D.I. [212](#)].

Related Documents:

- A. Certification of Counsel Regarding Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/09/2024; D.I. [266](#)]
- B. Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/10/2024; D.I. [272](#)]

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The Objection Deadline was extended to December 20, 2024 at 4:00 p.m. (ET).

Objections Received:

- C. Limited Objection of Sodexo Operations, LLC to: (1) Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJKG opco, LLC and IJKG, LLC and (C) Granting Related Relief; (2) Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief; and (3) Motion of the Debtors for an Order (I) Authorizing the Entry Into the Hospital Facilities Management Services Agreement, and (II) Granting Related Relief [Filed: 12/19/2024; D.I. [331](#)].
- D. Limited Objection and Reservation of Rights of Cerecore [Filed: 12/20/2024; D.I. [338](#)].

Status: The Debtors are not seeking approval of the Motion at this time. The Debtors will seek limited relief related to the Motion pursuant to D.I. 377 at a hearing scheduled for January 13, 2025 at 10:00 a.m.

- 11.** Motion of the United States Trustee for Entry of an Order Directing the Appointment of a Chapter 11 Trustee, or, in the Alternative, Converting the Cases to Chapter 7 Cases [Filed: 12/09/2024; D.I. [267](#)].

Related Documents:

- A. Joinder of BMC Hospital, LLC to Motion of United States trustee for Entry of an Order Directing the Appointment of a Chapter 11 Trustee, or, in the

Alternative, Converting the Cases to Chapter 7 Cases [Filed: 12/30/2024; D.I. [376](#)].

**Objection Deadline:** December 31, 2024 at 4:00 p.m. (ET). **The objection deadline was extended to January 8, 2025 at 4:00 p.m. and further extended to February 12, 2025 at 4:00 p.m.**

**Objections/Responses Received:**

**B. Declaration of Shamiq Syed Regarding Motion of the United States Trustee [Filed: 01/06/2025; D.I. 397].**

**Status: This matter has been continued to February 19, 2025 at 10:00 a.m.**

Dated: January 6, 2025

**DILWORTH PAXSON LLP**

/s/ Peter C. Hughes

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